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June 1, 2015

**VIA ELECTRONIC FILING  
AND EMAIL**

Hon. Paul A. Crotty, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 1350  
New York, NY 10007

RE: GOJO INDUSTRIES, INC. v.  
INNOVATIVE BIODEFENSE, INC.  
CASE NO.: 15-cv-2946 (PAC)

Dear Judge Crotty:

This office is counsel to Defendant Innovative Biodefense, Inc. ("Innovative") in connection with the above-referenced matter. In compliance with Your Honor's directive at the May 27, 2015 pre-motion conference with respect to Innovative's prospective motion to change venue, after consulting with our client, we have elected to proceed with said motion. I have consulted with James D. Arden, Esq., counsel to Plaintiff, with respect to a motion schedule and we request entry of the following schedule:

- Innovative to file its motion to change venue on or before June 10, 2015;
- Plaintiff to file its opposition on or before June 19, 2015;
- Innovative to file its reply, if any, on or before June 24, 2015; and
- Oral argument to be scheduled only if directed by the Court.

Thank you in advance for Your Honor's attention and consideration to this matter.

Respectfully,

ADAM K. KURLAND

AKK:jh

cc: James D. Arden, Esq. (via email)  
Mark J. Skakun, Esq. (via email)  
Benjamin A. Nix, Esq. (via email)